



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 10, 2022

**BY ECF**

**MEMO ENDORSED**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ying Sun et al.*, 21 Cr. 343 (SHS)**

Dear Judge Stein:

The Government writes on behalf of the parties to request that the Court adjourn the motion deadline for approximately 60 days, from June 13, 2022 to August 12, 2022, and that responses correspondingly be adjourned from June 27, 2022 to August 26, 2022. Trial is scheduled in this case for March 20, 2023, and an interim status conference is scheduled for September 12, 2022. The parties have been engaged in ongoing discussions regarding potential pretrial resolution, and the adjournment of the motion schedule is requested to facilitate the parties' discussions and potentially avoid the need for unnecessary litigation.

I have communicated with defense counsel for each of the defendants, who have all consented to the above requests.

Respectfully submitted,

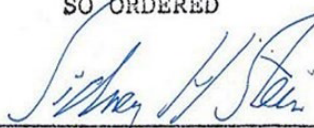
DAMIAN WILLIAMS  
United States Attorney

By:   
Brett M. Kalikow  
Assistant United States Attorney  
(212) 637-2220

cc: All counsel of record (via ECF)

The request to extend the motion schedule for 60 days as set forth above is granted.

Dated: New York, New York  
June 10, 2022

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.